

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

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In re	)	Chapter 11
	)	
TELEGLOBE COMMUNICATIONS	)	
CORPORATION, <i>et al.</i> ,	)	Jointly Administered
	)	Bankr. Case No. 02-11518(MFW)
	)	
Debtors.	)	
-----X	)	
TELEGLOBE COMMUNICATIONS	)	
CORPORATION,	)	
<i>et al.</i> ,	)	C.A. No. 04-1266 (SLR)
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
BCE INC., <i>et al.</i> ,	)	
	)	
Defendants.	)	
-----X	)	

**SUPPLEMENT TO DISCOVERY PLAN AND SCHEDULING ORDER**

WHEREAS, on October 14, 2004, the Court entered a "Discovery Plan and Scheduling Order" (Dkt. 43) (the "Order").

WHEREAS, paragraph 2(g) of the Order provides certain deadlines with respect to expert discovery.

WHEREAS, upon oral direction of the Court, the parties have conferred to extend those deadlines.

WHEREAS, paragraph 9 of the Order provides that "the deadlines set forth herein maybe extended by the parties' agreement without further order of the Court, provided the parties notify the Court promptly of any such extensions."

NOW, THEREFORE, IT IS HEREBY STIPULATED, by and between the parties,  
as follows:

1. Reports from retained experts pursuant to Rule 26(a)(2) on issues on which any party has the burden of proof shall be due on March 1, 2006.
2. Rebuttal reports of experts shall be due on April 14, 2006.
3. Document discovery with respect to expert witnesses shall be completed by April 21, 2006.
4. Expert depositions shall be completed by May 6, 2006.
5. Daubert motions shall be submitted by May 15, 2006. Thereafter, briefing will be completed on such motions pursuant to Local Rule 7.1.2.
6. No party shall use this Stipulation, nor the agreement to dates later than those contemplated in the original Order, to attempt in any way to move, continue, cancel and/or postpone the trial date set forth in the Order. Nor shall any party use in any way any immaterial modifications to this Stipulation to attempt to move, continue, cancel and/or postpone the trial date set forth in the Order.

Dated: December \_\_\_\_, 2005

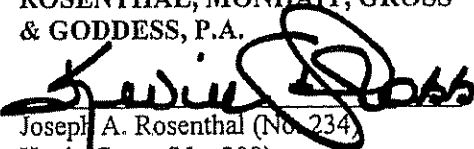
**RICHARDS, LAYTON & FINGER P.A.**

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Gregory V. Varallo (No. 2242)  
C. Malcolm Cochran, IV (No. 2377)  
Russell C. Silberglied (No. 3462)  
Chad M. Shandler (No. 3796)  
One Rodney Square  
P.O. Box 551  
Wilmington, Delaware 19801  
Telephone: (302) 651-7700

*Attorneys for the Debtors*

**ROSENTHAL, MONHAIT, GROSS  
& GODDESS, P.A.**



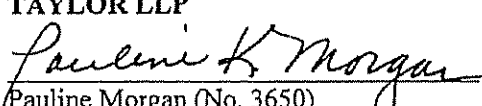
Joseph A. Rosenthal (No. 234)  
Kevin Gross (No. 209)  
919 Market Street, Suite 1401  
P.O. Box 1070  
Wilmington, Delaware 19899-1070  
Telephone: (302) 656-4433

-and-

John P. Amato  
HAHN & HESSEN LLP  
488 Madison Avenue  
New York, New York 10022  
Telephone: (212) 478-7200

*Attorneys for the Committee*

**YOUNG CONAWAY STARGATT &  
TAYLOR LLP**



Pauline Morgan (No. 3650)  
The Brandywine Building  
1000 West Street, 17th Floor  
P.O. Box 391  
Wilmington, Delaware 19899-0391  
Telephone: (302) 571-6600

-and-

George J. Wade  
Daniel Schimmel  
Shearman & Sterling LLP  
599 Lexington Avenue  
New York, NY 10022  
Telephone: (212)

*Attorneys for Defendants*